



Browning-Ferris Industries

**Browning-Ferris Industries of St. Louis, Inc.
11506 Bowling Green
Creve Coeur, MO 63141**

June 9, 1981

U.S. EPA Region 5
Sites Notification
Chicago, Illinois 60604



Dear Gentlemen:

Pursuant to Section 103(c) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), Browning-Ferris Industries of St. Louis, Inc. (hereinafter, together with its predecessors, is referred to as the "Company") hereby submits notifications (EPA Form 8900-1) for the following facilities, which were never owned or operated by the Company, but which were selected by Company for the disposal of hazardous wastes.

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|----|-------------------------------|--------------------|
| 1) | Rt. 203 | E. St. Louis, Ill. |
| 2) | Mal Landfill - Chain of Rocks | Granite City, Ill. |
| 3) | Sauget Landfill | E. St. Louis, Ill. |

Please be advised that while EPA Form 8900-1 is being utilized by the Company for purposes of complying with the Section 103(c) notification requirement, some revisions to the form have been made which we believe more appropriately reflect the type of information being submitted. Also, please be advised that some of the facilities listed above are [were] operated as sanitary landfills which generally receive(d) commercial, industrial wastes, as well as household wastes. The Company has instituted procedures designed to preclude the transportation of such wastes to third party (i.e., third party or municipally owned/operated) sanitary landfills. However, several factors have made, and continue to make, it impossible to know for certain whether any wastes, now deemed by regulation to be hazardous, have ever been unknowingly transported to any of these sanitary landfills.

- o Prior to November 19, 1980, few states or local governments required generators of hazardous wastes to determine if their wastes were hazardous. Nor were they required to inform off-site commercial transporters or landfill owners/operators such as the Company of the

JUN 15 1981

type or quantity of such wastes received for off-site disposal.


- o After November 19, 1980, only large generators of hazardous wastes were required to notify off-site commercial transporters and landfill owners/operators of the type and quantity of hazardous wastes received for off-site disposal.
- o Both before and after November 19, 1980, federal and state law have permitted the disposal of small quantities of hazardous wastes at sanitary landfills.

Therefore, Company has reported third party owned/operated sanitary landfills which the Company selected and to which it transported commercial, industrial or residential wastes, only if the Company has actual knowledge or a reasonable basis to believe that some of such wastes contained substances which would now be classified as hazardous.

In accordance with the public notice of the availability of Form 8900-1, 46 Fed. Reg. 22144 (April 15, 1981), the Company has not included facilities for which there has been previously filed a notification of hazardous waste activities and/or a "Part A" permit application as required by Sections 3005 and 3010 of the Resource Conservation and Recovery Act (RCRA).

Should you have any questions, please do not hesitate to contact the undersigned or Jim Scheline at (713) 870-8100.

Sincerely,


Stephen L. Thomas
Vice President

SLT/mbe